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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

FEB 21 1997

Federal Communications Commission
 Office of Secretary

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| In the Matter of |) | |
| |) | |
| Review of the Commission's Regulations |) | MM Docket No. 94-150 |
| Governing Attribution of Broadcast and |) | |
| Cable/MDS Interests |) | |
| |) | |
| Review of the Commission's Regulations |) | MM Docket No. 92-51 |
| and Policies Affecting Investment in the |) | |
| Broadcast Industry |) | |
| |) | |
| Reexamination of the Commission's |) | MM Docket No. 87-154 |
| Cross-Interest Policy |) | |
| |) | |
| Review of the Commission's Regulations |) | MM Docket No. 91-221 |
| Governing Television Broadcasting |) | |
| |) | |
| Television Satellite Stations Review of |) | MM Docket No. 87-7 |
| Policy and Rules |) | |
| |) | |
| Broadcast Television National Ownership |) | MM Docket No. 96-222 |
| Rules |) | |
| |) | |
| Review of the Commission's Regulations |) | MM Docket No. 91-221 |
| Governing Television Broadcasting |) | |
| |) | |
| Television Satellite Stations Review of |) | MM Docket No. 87-8 |
| Policy and Rules |) | |
| |) | |

To: The Commission

**EMERGENCY REQUEST FOR FUTHER EXTENSION
 OF TIME TO SUBMIT REPLY COMMENTS**

Media Access Project, Black Citizens for a Fair Media, the Center for Media Education, the Minority Media and Telecommunications Council, National Association for Better Broadcasting, the Office of Communication of the United Church of Christ, Philadelphia Lesbian and Gay Task Force, Telecommunications Research and Action Center, Washington Area Citizens Coalition Interested in Viewers' Constitutional Rights, and Women's Institute for Freedom of the Press ("MAP, *et al.*") respectfully request that the Commission extend the deadline for submission of reply comments in to the above-captioned matters for not less than ten days, the

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due date to be determined at such time as the Commission's Record Imaging Processing System (RIPS) is restored to full operational status, such that the extension is equal to the period of time that the RIPS system was inoperative.

This emergency request is based on the unexpected breakdown of the RIPS on or about February 11, 1997. The RIPS system is the primary mechanism for determining what comments have been filed, as well as reviewing such comments. This disruption has interfered with preparation of reply comments, and significantly exacerbated the hardships which which MAP, *et al.* had cited in their January 16, 1997 request for extension of time within which to file comments and reply comments in this proceeding. As of February 21, 1997, the system had been inoperative for ten days.

The Commission has previously determined that MAP, *et al.* had established that an extension for filing reply comments is in the public interest. The relief sought here would do no more than provide the same period of time that would have been available had not the RIPS system been unavailable.

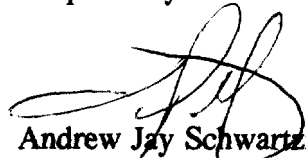
Comments filed by MAP, *et al.* in these multiple dockets were among the few comments filed on behalf of viewers and listeners, whose rights to have access to diverse sources of information are "paramount." *Red Lion Broadcasting Co. v. FCC*, 395 U.S. 367, 390 (1969). MAP, *et al.* are burdened with responding to scores of comments in numerous inter-related dockets in what are regarded as among the most important proceedings the Commission has undertaken in many years. Many of the same groups, represented by the same counsel, have been importuned by the Commission staff to participate in several other major "fast track" or expedited proceedings, including the Commission's dockets on the ESP exemption, DBS program obligations, and digital TV licensing, and the broadcast personal attack and political editorial

rules. Counsel for MAP, *et al.* have also participated in litigation challenging the Commission's recent detarriffing decision in which a judicial stay has been granted, and expedited briefing has been ordered.¹

Even had there not been a breakdown in the RIPS, these and other pending matters had placed insuperable burdens on the handful of counsel representing the general public in these matters. The RIPS failure has made the task far more difficult. The burdens fall also upon industry counsel; although these organizations have deeper pockets and greater resources, their ability to provide a complete record is similarly impaired. As a result, absent an extension, the Commission will not have a full and complete record upon which to base its deliberations, and its ability to ascertain the public interest will be damaged. The viewers of the nation would be victimized thereby.

For the foregoing reasons, MAP, *et al.* respectfully request that the Commission grant an the requested extension, and grant all such other relief as may be just and proper.

Respectfully submitted,



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¹Telecommunications Research and Action Center "TRAC"), one of the parties here, has intervened in the detarriffing matter. As an opponent of the Commission's action, TRAC (and its counsel) had no control over the timing of the Commission's decision or the need to challenge it on an expedited basis. The fact that the Court of Appeals has stayed the Commission's decision demonstrates the importance of the matter, and the non-frivolous nature of the decision to seek review of it.